

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

“LILY,” “SARAH,” PIKES PEAK  
PROBATE SERVICES as Conservator for  
“SIERRA,” “SOLOMON,” “HENLEY,”  
WILLIAM L.E DUSSAULT as Guardian ad  
Litem for “VIOLET,” a minor, JANE ROE,  
as next of friend for “PIA,” a minor,  
“JENNY”, and ‘FIONA.’

Plaintiffs,

v.

MICHAEL MILLIMAN,

Defendant.

Case No:

Jury Trial Demanded

**DECLARATION OF JAMES R. MARSH IN SUPPORT OF  
PLAINTIFFS’ MOTION TO PROCEED UNDER PSEUDONYMS**

I, JAMES R. MARSH, hereby declare the following to be true and correct under penalty  
of perjury of the laws of the United States of America:

1. I make this declaration in support of Plaintiffs’ motion to proceed in this matter  
using pseudonyms.

2. I, along with Carol L. Hepburn and Deborah A. Bianco, represent the Plaintiffs  
“FIONA” of the BluesPink1 Series of child pornography and “JENNY” of the Jenny Series of  
child pornography. I am not counsel of record in the instant matter, but primarily direct all legal  
matters for each of them related to their status as sex abuse survivors. I am making this

declaration based upon my own personal knowledge and professional experience as an attorney in support of the Plaintiffs' Motion to Proceed Using Pseudonyms.

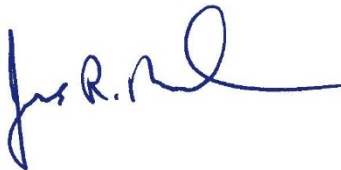
3. I have represented Plaintiff Jenny since 2016. I have represented Plaintiff Fiona since 2013. I have represented both Jenny and Fiona in multiple criminal and civil matters related to their victimization through child pornography. In each of these matters, a pseudonym has been used in order to protect their anonymity. No court has ordered that they proceed with their legal name in any court proceeding.

4. Jenny and Fiona request permission to use pseudonyms herein in order to protect themselves from harassment, injury, ridicule and personal embarrassment.

5. Jenny and Fiona have each suffered and continue to suffer from grievous psychological harm resulting from the child pornography related crimes of which they were victim. Both Fiona and Jenny suffer from anxiety, depression, post-traumatic stress disorder, and hyper-vigilance. They each live in daily fear that someone will discover their identities and link them to the child sexual abuse images of them on the Internet. They believe, as do I, that exposing their legal names to the public will put them in significant physical and emotional danger.

DATED this 22nd day of December, 2022, at New York, New York.

**MARSH LAW FIRM, PLLC**

A handwritten signature in blue ink, appearing to read "James R. Marsh", written over a horizontal line.

James R. Marsh, Esq.  
31 Hudson Yards, 11th Fl.

New York, NY 10001  
Attorney for Plaintiffs Jenny and Fiona